

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ELECTRONIC PRIVACY INFORMATION CENTER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-810 (RBW)
)	
UNITED STATES DEPARTMENT OF JUSTICE,)	
)	
Defendant.)	
JASON LEOPOLD, BUZZFEED, INC.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 19-cv-957 (RBW)
)	
UNITED STATES DEPARTMENT OF JUSTICE, et al.)	
)	
Defendants.)	
)	

DEFENDANT’S UNOPPOSED MOTION TO EXCEED PAGE LIMITS

Defendant respectfully requests leave to file a memorandum in support of its motion for summary judgment that exceeds the 45-page limit set by Local Civil Rule 7(e) and Court Order. *See* General Order, Dkt. 10. Defendant requests an additional 10 pages, for a total of 55 pages. Before filing this motion, pursuant to Local Civil Rule 7(m), undersigned counsel conferred with counsel for both sets of Plaintiffs about this request, who reported that Plaintiffs consent to it.

Good cause exists to grant this motion. Plaintiffs in this consolidated Freedom of Information Act (“FOIA”) case filed FOIA requests with Defendant, the Department of Justice, for the confidential report submitted by Special Counsel Robert S. Mueller, III to the Attorney

General pursuant to 28 C.F.R. § 600.8, titled “Report On The Investigation Into Russian Interference In The 2016 Presidential Election” (the “Report”). The Department of Justice’s Office of Information Policy processed the Report under the FOIA and made redactions pursuant to Exemptions 3, 5, 6, 7(A), 7(B), 7(C), and 7(E) of the FOIA. Plaintiffs challenge each and every redaction in the Report. Accordingly, Defendant must address each exemption and, in certain instances, the multiple categories of information withheld under those exemptions. In order to address all the challenged withholdings, Defendant respectfully requests that it be granted an additional 10 pages for its summary judgment brief, for a total of 55 pages.

A proposed order is attached.

Dated: May 31, 2019

Respectfully submitted,

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Deputy Assistant Attorney General
Civil Division

ELIZABETH J. SHAPIRO
Deputy Director
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/s/ Courtney D. Enlow
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2019, I electronically transmitted the foregoing to the parties and the clerk of court for the United States District Court for the District of Columbia using the CM/ECF filing system.

/s/ Courtney D. Enlow

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JASON LEOPOLD, BUZZFEED, INC.,

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Defendants.

Civil Action No. 19-cv-810 (RBW)

Civil Action No. 19-cv-957 (RBW)

[PROPOSED] ORDER

Upon consideration of Defendant's Unopposed Motion to Exceed Page Limits, it is hereby ORDERED that Defendant's Motion is GRANTED; and it is FURTHER ORDERED that Defendant may file a Memorandum in Support of its Motion for Summary Judgment not to exceed 55 pages in length.

Dated:

THE HONORABLE REGGIE B. WALTON
UNITED STATES DISTRICT JUDGE